

HONORABLE TANA LIN

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE

NEXON KOREA CORPORATION, a Korean
Corporation,

Plaintiff,

v.

IRONMACE CO., LTD., a Korean
Corporation; JU-HYUN CHOI, individually;
and TERENCE SEUNGHA PARK,
individually,

Defendants.

Case No.: 2:23-cv-00576-TL

DECLARATION OF JASON PARK IN
SUPPORT OF PLAINTIFF'S
OPPOSITION TO DEFENDANTS'
MOTION TO DISMISS FOR *FORUM*
NON CONVENIENS

NOTE ON MOTION CALENDAR:
JULY 14, 2023

ORAL ARGUMENT REQUESTED

I, Jason Park, declare and state as follows:

1. I am over 18 years of age. The statements made herein, are known by me to be true and correct, and if called upon, I could and would competently testify to those facts.

2. I am fluent in Korean and English. I have eight years of experience as a full-time legal translator, translating documents in Korean to English and English to Korean. I have extensive experience translating legal documents, such as contracts, from Korean to English. I have translated many legal documents for use in court proceedings in the United States and Korea.

3. I have been provided with and reviewed copies of “Annual Salary Agreement”¹ and “Confirmation of Rights to Business-Related Intellectual Property,”² entered between Nexon and Ju-Hyun Choi. Dkt.#32, Ex. A, Ex. B.

4. Regarding the Korean phrase “본 계약과 관련하여” in the forum selection clause of the Annual Salary Agreement (art. 7(4)) and Confirmation of Rights to Business-Related Intellectual Property (art. 5(2)), there are multiple possible English translations.

5. Possible translations of the phrase “본 계약과 관련하여” include but are not limited to:

- a. Arising out of this agreement
- b. In connection with this agreement
- c. Regarding this agreement
- d. Based upon this agreement

6. These translations are, to the best of my knowledge and belief, true and correct translations. I further declare that I am neither counsel for, related to, nor employed by any of the parties, and that I have no financial or other interest in the outcome of any action related to this translation.

7. I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct to the best of my knowledge.

EXECUTED this 10th day of July 2023 at Seoul, Korea.


Jason Park

¹ Also known as “Employment Agreement.”

² Also known as “Acknowledgement about Company IP.”